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April 30, 2024

VIA ECF

The Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 425
New York, New York 10007

Re: **JOINT LETTER MOTION REQUESTING ADJOURNMENT OF INITIAL CASE MANAGEMENT TELEPHONE CONFERENCE**

Brockmole, et al. v. EZ Festivals LLC, et al.
Avchukov, et al. v. Avant Gardner, LLC, et al.
Palie, et al. v. EZ Festivals LLC, et al.
Ting, et al. v Avant Gardner LLC, et al.

Case No. 1:23-cv-08106-MMG-JW (Consolidated)

Dear Judge Willis:

Our firm represents Defendants EZ Festivals LLC, Avant Gardner LLC, Made Event LLC and Jurgen Bildstein in the above four putative class action lawsuits, and together with counsel for all Plaintiffs, we write, per Rule I.C. of Your Honor's Individual Practices, to jointly request an approximately two-week adjournment of the Initial Case Management Telephone Conference recently scheduled for May 7, 2024 at 11:30 a.m., as well as the concomitant deadlines for the parties to conduct a Rule 26(f) conference and to file their Proposed Case Management Plan and Report of Rule 26(f) Meeting and related joint letters. (ECF No. 70).

As noted, the conference is originally scheduled for May 7, 2024, while the parties are to file their Proposed Case Management Plan and Report of Rule 26(f) Meeting, and joint letter on the status of pending motions to dismiss and motion to strike, by May 3, 2024. There have been no previous requests for an adjournment or extension of these deadlines. The reason for the requested adjournment and extension is that Defendants' lead counsel is on a long-planned extended family vacation through April 30, 2024, making the pre-conference deadlines difficult for him to achieve. Counsel for all Plaintiffs have consented to this adjournment and extension request.

The parties note they previously agreed to and will exchange Rule 26(a) Initial Disclosures by April 30, 2024. The parties have also agreed on a briefing schedule concerning Defendants' motion to strike, or in the alternative, to dismiss the Avchukov Plaintiffs' Amended Consolidated Class Action Complaint, which proposed briefing schedule will be submitted to the Court separately. (ECF Nos. 65-67).

We appreciate the Court's consideration of this request.

Respectfully submitted,

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